

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Shenzhen Dejiayun Network Technology Co., Ltd.,)	
)	
Plaintiff,)	Case No.: 1:21-cv-06607
v.)	
)	Hon. Judge Manish S. Shah
The Partnerships and Unincorporated Associations Identified on Schedule "A",)	
)	Hon. Jeffrey I. Cummings
)	
Defendants.)	

Unopposed Motion for Extension of Time

NOW COME defendants LAMODE, Grande vente, YUCELP Outlets, MCKESONYRAS, and T-USA ("Defendants"), by and through their undersigned counsel, and hereby move this Court to extend the time to file a response to Plaintiff's motion to compel. In support of their motion, Defendants state as follows:

1. Plaintiff filed its Motion to Compel on October 7, 2022. [Dkt. 81].
2. On October 11, 2022, the Court set October 20, 2022 as the date on which Defendants were to respond and October 27, 2022 as the date on which Plaintiff was to reply. [Dkt. 83].
3. Defendants require a short additional time to consider and respond to Plaintiff's motion to compel and voluminous declaration in support thereof.
4. This Court may, for good cause, extend the time by which Defendant's responses are due "if a request is made, before the original time or its extension expires." Fed. R. Civ. P. 6(b)(1)(A).
"[U]nder Rule 6(b)(1) as interpreted by case law, the term "good cause" imposes a light burden."
McCann v. Cullinan, 2015 WL 4254226, at * 10 (N.D. Ill 2015), *citing*, 1 Moore's Federal Practice § 6.06 [2] p. 632 (Matthew Bender 3d ed. 2013).

5. Defendants respectfully request this Court extend the date on which Defendants are to have filed response(s) to Plaintiff's Motion to Compel until October 27, 2022, and Plaintiff to reply until November 3, 2022.
6. This Motion has been filed in good faith and in the interest of judicial economy, and is not interposed for purposes of delay.
7. This is the second motion for an extension of time filed by Defendants.
8. Plaintiff has indicated that it does not oppose Defendants' requested extensions.

WHEREFORE, for the foregoing reasons, Defendants respectfully request that this Honorable Court enter an Order:

- a) extending the date on which Defendants' response to Plaintiff's Motion to Compel are due until October 27, 2022;
- b) extending the date on which Plaintiff's reply is due until November 3, 2022.

Dated: October 20, 2022

/s/Adam E. Urbanczyk
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